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United States
Department of
Agriculture

Forest Service

Manti-La Sal National Forest Original /0/5/032 #2

cc. Lowell, Daron,
Jim S.

599 West Price River Dr.

Price, Utah 84501

Reply to: 2820-4

(801) 637-2817

Date: January 24, 1994

State of Utah, Department of Natural Resources Division of Oil, Gas and Mining ATTN: Mr. Daron R. Haddock 355 West North Temple 3 Triad Center, Suite 350 Salt Lake City, Utah 84180-1203



JAN 2 6 1994

DIVISION OF OIL, GAS & MINING

Dear Daron:

Re: Updated Mine Plan Information, Genwal Coal Company, Crandall Canyon Mine, ACT/015/032, Folder #2, Emery County, Utah, dated July 30, 1993

We have reviewed the updated mine plan information for the Genwal Coal Company, Crandall Canyon Mine, which we received on August 9, 1993. The most significant comments concern mining impacts to water resources.

Several times the mitigation for water loss from springs impacted by mining is mentioned (pages 3-8, 3-13, 3-16, 5-27, 5-29, 7-14, and 7-28). Genwal says if flows are reduced by 50% or more they will contact the Utah Division of Wildlife Resources and install guzzlers. This mitigation may only be acceptable to the Forest Service in unusual circumstances. In the previous mine plan, on page 14-32, Genwal agreed to notify the appropriate agencies and begin developing an acceptable mitigation plan. This statement should be incorporated into the updated mine plan.

The section on the Blind Canyon Drainage (pages 7-20 and 7-21) does not adequately explain the mitigation for increased sediment which may be put into Huntington Canyon due to retreat mining in Blind Canyon. The following information must be added:

- 1. Genwal is mitigating the increased sediment they may add to Huntington Canyon. The text should be changed to state that the mitigation must be done within the Huntington Canyon drainage, not just "elsewhere in the Manti-La Sal National Forest", as stated on page 7-21.
- 2. Genwal has donated \$10,000 to gravel the Nuck Woodward Canyon Road from Huntington Canyon to the trailhead for the Castle Valley Ridge Trail System. The text should state how much sediment will be decreased by the mitigation.
- 3. Another appendix is needed to show the calculations of how much sediment input to Huntington Canyon will be reduced by graveling the Nuck Woodward Canyon Road.

The following comments also need to be addressed:

Page 2-11, 5th paragraph. If the area is to be used for livestock grazing, it should be fenced so the vegetation can be reestablished.

Page 3-6, 5th paragraph, last sentence. What bird species is this referring to?

Page 3-7, 2nd paragraph, 2nd sentence. This reference to the golden eagle does not make sense. The entire paragraph should be rewritten.

Page 3-16, 1st paragraph. The water shares in the Huntington-Cleveland Irrigation Company may be used to mitigate a problem on the eastern side of East Mountain. How would they mitigate a problem on the western side of East Mountain?

Page 3-27, section 3.53.300. The Divison should not grant an exception to these requirements until they have the consent of the surface management agency.

Page 3-30, section 3.56.400. The first sentence does not make sense and should be rewritten.

Page 6-10, section 6.31, second paragraph. The hole-plugging method described is no longer acceptable. The hole must be totally filled with cement, as specified in the BLM hole plugging requirements.

Appendix 1-2. Page 3 of Exhibit 1 is missing.

If you have any questions please contact us at the Forest Supervisor's Office at (801) 637-2817.

Sincerely,

For

GEORGE A. MORRIS Forest Supervisor

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